Risk Pool Peer Review Committee Report

Big Bend Community Based Care - Circuits 2 and 14 (Bay, Calhoun, Franklin, Gadsden, Gulf, Hamilton, Jackson, Jefferson, Leon, Liberty, Wakulla and Washington Counties)

Fiscal Year 2018-2019

October 2018

Executive Summary:

Big Bend Community Based Care (BBCBC) submitted an application for risk pool funding on August 17, 2018. The application was subsequently reviewed by the Northwest Region and, with the concurrence of the Regional Managing Director, was submitted to the Office of the Deputy Secretary.

The department established a Risk Pool Peer Review Committee pursuant to section 409.990(7), Florida Statutes, for state fiscal year (FY) 2018-2019. The Risk Pool application process was informed by lessons learned from the prior year reviews as well as the availability of extensive additional information from reports developed pursuant to proviso language included in the General Appropriations Act (Specific Appropriation 322) for FY 2017-2018. In compliance with this proviso language, the department completed a comprehensive, multi-year review of the revenues, expenditures and financial position of all Community-Based Care Lead Agencies (CBCs) including a comprehensive system of care analysis. This submission also included a financial viability plan from all lead agencies.

The Risk Pool Protocol provided for priority consideration for any CBC with increased removals based on a 12-month moving average from May 2016 to May 2018. This criterion was based on the experience from prior year reviews that found that significant increases in removals is a key indicator of financial vulnerability for a lead agency. Tier one for priority consideration was lead agencies with an increase in removals of 10 percent or more. BBCBC was in Tier three for priority consideration with a 2.09 percent decrease in removals.

Due to the early application process this fiscal year, the Risk Pool Peer Review Committee conducted a review with relevant information available from multiple sources to make recommendations. The documents reviewed are below:

- Risk Pool Funding Application FY 2018-2019
- Financial Viability Plan (FY 2017-2018 and FY 2018-2019)
- Budget Projections provided by the CBC
- CBC Financial Viability Integrated Data Report
- The Child Welfare Dashboard
- CBC Contract Monitoring Reports
- **CBC Contract Monitoring Data Packets**
- The Child Welfare Key Indicators Monthly Report
- Florida Safe Families Network (FSFN) Aggregate Payment Data
- On-Site Interviews

The Risk Pool Peer Review Committee for BBCBC consisted of:

Lee Kaywork, Team Leader

JoShonda Guerrier, Assistant Secretary for Child Welfare

Barney Ray, Office of CBC/ME Financial Accountability

Billy Kent, Northeast Region Family and Community Services Director

April May, Suncoast Region Community Development Director

Kelly Welch, DCF CBC Contract Monitoring Team

Naomi McGowan, CFO, Family Support Services of North Florida

Catherine Macina, CFO, Community Based Care of Central Florida

Michael DiBrizzi, CEO, Camelot Community Care

While the specific areas of review and analysis varied based on the unique needs and circumstances of each Region, Circuit and CBC, the following framework provided an outline for organizing the work of the Peer Review Committee.

Application Summary:

BBCBC's application for risk pool funding requested \$577,224. Funding is being requested to assist with last fiscal year's increase in out-of-home care and to help support the CASE Aim initiative in Circuit 14 which is intended to reduce the number of children in out-of-home care.

The primary causes BBCBC attributed to their current financial challenges are outlined below:

- An increase in the number of children entering out-of-home care, with a net increase of approximately 200 children in the past fiscal year.
- Lack of available medical and behavioral health providers funded through the Child Welfare Specialty Plan.
- A steady increase in the cost of out-of-home care placements from FY 2015-2016 to present.

Findings:

After review of the information provided, the Peer Review Committee was able to reach the following findings:

- 1. Findings related to the need for services and commitment of resources
 - Sources: (<u>The Child Welfare Key Indicators Monthly Report</u>, <u>The Child Welfare Dashboard</u>, <u>CBC Contract Monitoring Reports</u>)
 - 1.1. What is the relevant community context within which the child welfare system operates?
 - 1.2. This may include incidence of calls to the hotline, child poverty in the area, local factors that influence the need for services, etc.

1.3. Factors may also include community resources available to meet the needs of children and families such as Children's Services Councils, local governmental resources or other unique factors.

BBCBC operates in Circuits 2 and 14 (Bay, Calhoun, Franklin, Gadsden, Gulf, Hamilton, Jackson, Jefferson, Leon, Liberty, Wakulla and Washington counties). Child Protective Investigations and Children's Legal Services are performed by the department. BBCBC is also the Managing Entity in Circuits 1 (Escambia, Santa Rosa, Walton and Okaloosa Counties), Circuits 2 and 14, and a portion of Circuit 3 (Madison and Taylor Counties). The rural nature of the majority of counties served by BBCBC presents a challenge to the provision of diverse and readily available services, placing a burden on case managers in implementing their case plans for families.

According to the US Census Facts, all counties served by BBCBC, with the exception of Wakulla County, have higher poverty rates and lower median household incomes than the statewide average rates. In nine of the 12 counties, a lower percentage of the population over the age of 25 has earned a high school degree and, with the exception of Leon county, a lower percentage of the population over the age of 25 has earned a college degree than the statewide average rates.

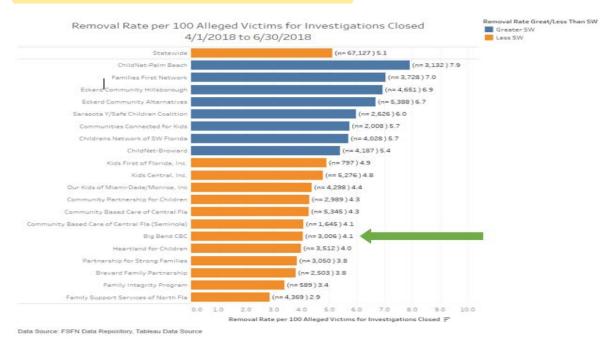
While the number of reports accepted for investigation decreased from FY 2016-2017, the number of children entering and receiving out-of-home care increased. During this same time period, the number of children receiving in-home services increased. The number of young adults receiving services decreased while the number of children receiving family support services remained consistent.

Service Area Data						
		Fy 2015/2016	Fy 2016/2017	FY 2017/2018		
Child Protective Investigations and Child Removals (Bay, Calhoun, Franklin, Gadsden, Gulf, Holmes, Jackson, Jefferson, Leon, Liberty, Wakulla, Washington Counties)	Reports accepted for Investigation by DCF (Initial & Additional Reports)	9,084	9,098	8,769		
	Children Entering Out-of-Home	595	567	629		
	Children Receiving In-Home Services	844	769	784		
Children Served by Big Bend CBC	Children Receiving Out of Home Care	1,270	1,357	1,441		
Children Served by big bend CbC	Young Adults Receiving Services	145	143	134		
	Children Receiving Family Support Services	922	1,037	1,033		
Data Sources: Child Protective Investigation Trend Report, Child Welfare Dashboard, FSFN OCWDRU Report 1006						

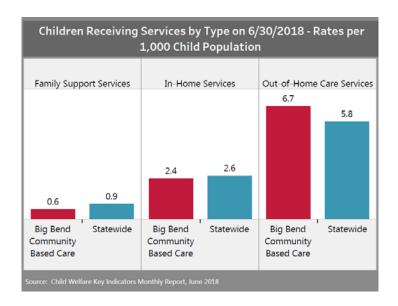
2. Findings related to protective services including removals, referrals for post-investigative services, activities to protect children without removal and use of resources focused on prevention and intervention.

- Sources: (The Child Welfare Key Indicators Monthly Report, The Child Welfare Dashboard, CBC Contract Monitoring Report)
- 2.1. What are the rates of removal, rates of verification, and other measures from protective investigations that affect the need for child welfare services? How have these measures changed over time and how do they compare with other areas of the state?
- 2.2. What activities are in place to provide support to protective investigators and families to permit children to remain safely in their homes? What services are provided with funds used for prevention and intervention?
- 2.3. How well integrated are the CPI, safety management and intervention services components? Are there case transfer issues that affect performance?

The removal rate per 100 alleged victims for investigations closed from 4/1/2018 to 6/30/2018 is less than the statewide average, as shown in the graphic below. However, in the past year, BBCBC faced a spike in removals on several occasions. Most notably, Circuit 2 experienced an increase in removals in April and October 2017 and again in June 2018. In Circuit 14, August 2017 and February/March 2018 saw an increase in the number of children removed.



BBCBC has a higher rate of children being served in out-of-home and a lower rate of children receiving in-home and family support services than the statewide average.



Interviews conducted during the Risk Pool evaluation revealed that services intended to minimize the number of children removed from their home are not widely available or of sufficient quality to fully address family dynamics. For example, crisis intervention services are limited, especially after hours and on the weekends. Recently, changes to BBCBC's service array have been initiated and are aimed at improving service provision, thereby reducing an overreliance on out-of-home care services.

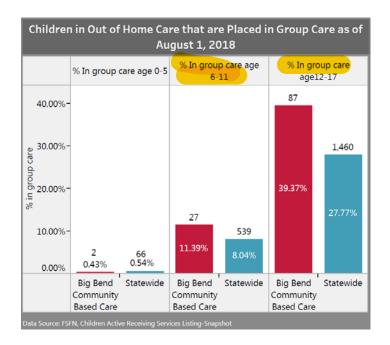
Turnover of front line staff has a negative impact on service delivery. BBCBC's section 409.988, Florida Statutes, reporting as of July 2018 shows a high Rolling Year turnover rate for case managers. Investigations staff reportedly encounter resistance or lack of availability to lower level intervention attempts such as in-home services.

In July 2016, the Office of Child Welfare initiated a <u>Service Array Assessment</u> with each CBC across the state. The assessment focuses on evaluating the availability, access, and application of services for families involved in the child welfare system. BBCBC submitted information to the Office of Child Welfare about their safety management and family support programs. Based on the information provided, BBCBC received a rating of "2" for the safety management services program. BBCBC received a rating of "1" for their family support services programs. BBCBC recently re-submitted information for rating reconsideration which is currently being reviewed by the Office of Child Welfare.

- 3. Findings related to provision of services for children in care (both in-home and out-of-home)
 - Sources: (<u>The Child Welfare Key Indicators Monthly Report</u>, <u>The Child Welfare Dashboard</u>, <u>CBC Contract Monitoring Report</u>, <u>CBC Financial Viability Report</u>, <u>CBC Financial Viability Integrated Data Report</u>, <u>CBC Budget Projections</u>, and <u>Florida Safe Families Network</u> (<u>FSFN</u>) <u>Aggregate Payment Data</u>)
 - 3.1. What is the composition of the children in care including age cohorts, placement types, use of specialized higher cost settings, use of congregate care, etc.

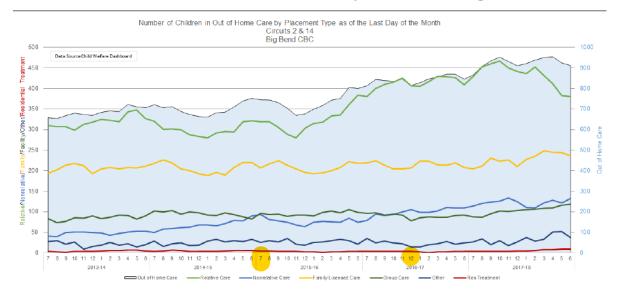
- 3.2. What is the cost of various placement types? To what extent are the rates paid for foster care (including care with various rates of intensity), and congregate care consistent with statewide norms (considering community context)? Have these rates remained relatively consistent over the past few fiscal years?
- 3.3. What is the cost for dependency case management? Is this consistent with norms for such services? Have these rates remained relatively consistent over the past few fiscal years?
- 3.4. To what extent is the CBC appropriately utilizing non-child welfare funding for services (such as DCF SAMH Funds, Medicaid, and other non-DCF funding sources).
- 3.5. What evidence exists that case management services are well-managed by the CBC?

As of August 1, 2018, more children ages 6-17 being served by BBCBC were placed in group care than the statewide average.



Since FY 2015-2016, children placed in facility-based residential group care has grown disproportionately to placements in other settings. Recently, BBCBC brought recruitment and licensing in-house in Circuit 2 and plans to increase support to foster home caregivers in an effort to reduce the number of children placed in residential group care.

Children in Out of Home Care by Placement Setting



Between FY 2016-2017 and FY 2017-2018, BBCBC more than doubled the amount paid for residential group care for children ages 0-5. Additionally, while not double the cost, there was also an increase in residential group care expenditures for children ages 6-12 and 13-17.

Big Bend Community Based Care (Contract # BJ101) Total \$ of FSFN Payments to Licensed Residential Group Care (OCA LCRGE)						
Ages	es FY2016-2017 FY2017-2018 Increa		Increase/(Decrease)	% Increase/(Decrease)		
0-5	\$68,330	\$105,598	+\$37,268	+55%		
6-12	\$1,101,578	\$1,417,148	+315,570	+29%		
13-17	\$2,315,637	\$2,915,966	+600,329	+26%		

Further, during this time period there was a significant decrease in the number of children ages 0-5 served in residential group care while the number of children ages 6-17 increased. The median daily rate for children ages 6-12 and 13-17 increased to \$79 and \$135 per day respectively.

Big Bend Community Based Care (Contract # BJ101) Total Number of Unique Clients in Licensed Residential Group Care (OCA LCRGE)					
Ages	FY2016-2017	FY2017-2018	Increase/(Decrease)	% Increase/(Decrease)	
0-5	12	5	-7	-58%	
6-12	82	83	+1	+1%	
13-17	123	148	+25	+20%	

Big Bend Community Based Care (Contract # BJ101) Median Daily Rate \$ in Licensed Residential Group Care (OCA LCRGE)						
Ages	FY2016-2017	FY2017-2018	Increase/(Decrease)	% Increase/(Decrease)		
0-5	\$120	\$120	+0	+0%		
6-12	\$64.70	\$79	+14.30	+22%		
13-17	\$123	\$135	+12	+10%		

Notable increases in spending were seen in enhanced group care, non-Medicaid residential treatment and APD group home placement. BBCBC's foster home Board Rates are the state minimum rates. Therapeutic foster home rates are covered by Medicaid, however BBCBC pays for dually licensed Medical and Therapeutic homes, mostly in Leon county, until permanency is achieved. APD is not paying for these services because the children do not meet APD's eligibility criteria of medical necessity. In June 2018, enhance rates were paid for 33 clients. BBCBC was able to bring that number down to 12 clients in August 2018. BBCBC tracks enhanced rate payments with separate service types in FSFN for both foster and group home placements.

Big Bend Community Based Care (Contract # BJ101) Total \$ of Payments by FSFN Service Type in Licensed Residential Group Care (OCA LCRGE)						
FSFN Service Type	FY2016- 2017	FY2017- 2018	Increase/ (Decrease)	% Increase/ (Decrease)		
Group Home	\$2,221,346	\$1,712,934	-\$509,412	-23%		
Group Home Enhanced	\$1,550	\$725,566	+\$724,016	467,000%		
Shelter Facility Fixed Price	\$532,420	\$695,490	+\$163,070	+31%		
Group Home Fixed Price	\$422,852	\$319,242	-\$103,610	-25%		
Residential Treatment - Non- Medicaid	\$56,773	\$446,469	+\$389,696	+686%		
APD Group Home Plmt	\$68,597	\$225,640	+157,043	+228%		
Group Home and 100806	\$0	\$178,099	+\$178,099			

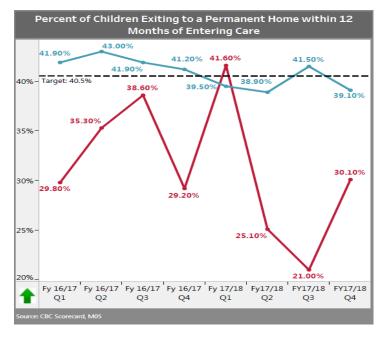
Other community changes will impact BBCBC's system of care, some positively. The Agency for Healthcare Administration recently made significant changes to the Statewide Medicaid Managed Care (SMMC) Program that should improve access to medical and dental care to children in Circuits 2 and 14. Sunshine Health manages the child welfare SMMC Specialty plan throughout the state and has been selected to replace the existing provider, which will enhance services to children involved in the dependency system beginning in February 2019. This change should improve medical and dental outcomes for children and reduce cost to the CBCs for the provision of these services.

4. Findings related to exits from care including exits to permanence.

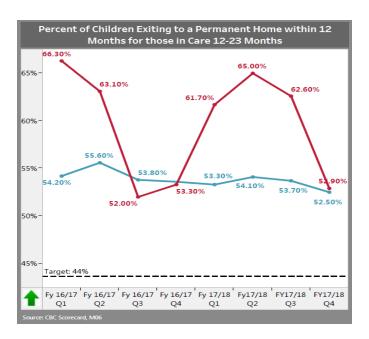
Sources: (The Child Welfare Key Indicators Monthly Report, The Child Welfare Dashboard, <u>CBC Contract Monitoring Report</u>, Financial Viability Integrated Data Report)

- 4.1. What is the performance of the CBC in the recognized measures of children achieving permanence? Do these findings indicate that children are not remaining in care for longer than necessary? Are these permanency achievement rates consistent across placement settings?
- 4.2. What contextual factors (such as Children's Legal Services, dependency court dynamics, etc.) influence time to permanence for children served by the CBC?
- 4.3. Has there been a change in the number of exits or time to exit that is materially influencing the cost of out-of-home care?

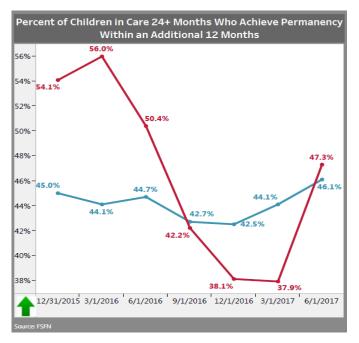
Overall BBCBC has seen a reduction in the percentage of children exiting to a permanent home within 12 months of entering care. BBCBC has performed below the statewide average on this performance measure in seven of the past eight quarters. Subsequently, children are staying in care longer which, coupled with higher re-entry rates, indicates that children are not achieving timely permanency.



Exits within an additional 12 months for children in care 12-23 months has fluctuated in the past eight quarters, but has mostly exceeded the statewide average performance.



The percentage of children in care 24+ months who achieve permanency within an additional 12 months has declined in four of the past five quarters.



Overall partner relationships in the service area are generally positive. Leadership on all levels are typically able to work through and resolve challenges at the local level. Monthly meetings are held between the Region and BBCBC. Frontline relationships are impacted by the high amount of turnover, and friction exists around case transfer and the availability and impact of local services, which is not unusual. Further, interviewees in multiple groups discussed the need to enhance knowledge and application of the practice model, specifically the identification of conditions for return which could be contributing to permanency delays.

- 5. Findings related to funding, fiscal trends and fiscal management.
 - Sources: (<u>The Child Welfare Key Indicators Monthly Report</u>, <u>The Child Welfare Dashboard</u>, CBC Financial Viability Report, CBC Financial Viability Integrated Data Report and CBC Budget Projections)
 - 5.1. How has core services funding changed over time? How has the CBC managed these changes? What adjustments to the available array of services have been made? (For service array response see section1)
 - 5.2. How has any changes to core services funding contributed to any projected deficits for FY 2018-2019?
 - 5.3. In what ways are funding dynamics in the CBC unique or atypical of funding in other CBCs?
 - 5.4. What is the amount of the anticipated deficit for the current year? How reliable and valid are these projections?
 - 5.5. Are their options other than Risk Pool funding available to reduce the deficit?
 - 5.6. If the Lead Agency meets the criteria for Risk Pool funding but the amount of funding available is insufficient to cover the projected deficit, what other options are available?
 - 5.7. Are there fiscal practices that could be completed with greater efficiency in order to reduce the projected deficit? (None were identified.)
 - 5.8. Has the most recent CPA audit indicated any issues that would affect the financial health of the organization?

Total Funding

DCF Contract Funds Available at Year End (by Fiscal Year)	FY13-14	FY14-15	FY15-16	FY16-17	FY17-18	FY18-19	
Core Services Funding	\$25,069,269	\$25,115,299	\$25,442,910	\$25,537,423	\$25,649,578	\$25,670,255	
Risk Pool Funding	\$0	\$0	\$0	\$0	\$0	\$0	
CBC Operations "Back of the Bill" Funding	\$0	\$0	\$0	\$0	\$828,155	\$0	
Other Amendments to Initial Allocations	\$25,605	\$50,661	\$283,151	\$140,811	\$266,114	\$0	
Amended Core Services Funding	\$25,094,874	\$25,165,960	\$25,726,061	\$25,678,234	\$26,743,847	\$25,670,255	
Funding not defined as Core Services Funding							
Independent Living (IL and Extended Foster Care)	\$994,718	\$994,718	\$994,718	\$994,718	\$1,055,921	\$1,394,979	
Children's Mental Health Services (Cat 100800/100806)	\$421,235	\$421,235	\$421,235	\$421,235	\$421,235	\$421,235	
PI Training, Casey Foundation or other non-core svcs	\$0	\$0	\$0	\$0	\$0	\$0	
Safety Management Services (Nonrecurring)	\$0	\$0	\$0	\$199,188	\$0	\$199,188	
Total at Year End	\$26,510,827	\$26,581,913	\$27,142,014	\$27,293,375	\$28,221,003	\$27,685,657	
Maintenance Adoption Subsidy (MAS)	\$6,474,818	\$6,666,824	\$7,767,576	\$8,201,856	\$8,871,660	\$8,828,818	
MAS Prior Year Deficit			-\$183,871				
Carry Forward Balance from Previous Years	\$695,158	\$326,207	\$14,911	\$549,310	\$475,457	\$69,844	
Total Funds Available	\$33,680,803	\$33,574,944	\$34,740,630	\$36,044,541	\$37,568,120	\$36,584,319	

BBCBC has never received any significant increases in Core Services funding. In FY 2017-2018, BBCBC received "back of the bill" funding for an operating deficit which is the first time BBCBC received funding for an operating deficit. FY 2018-2019 is the first time BBCBC applied for Risk Pool funding.

BBCBC received increases in funding for Independent Living in FY 2017-2018 and again in FY 2018-2019. They also received a non-recurring allocation of \$199,188 in

FY 2018-2019 for Safety Management Services which provides additional resources for the CBC.

Projected Revenues

The due date for risk pool applications for FY 2018-2019 from CBCs to the department was mid-August which was before the final FY 2017-2018 expenditures were completed by CBCs and submitted to the department. Therefore, applicant CBCs had to make some assumptions about their FY 2017-2018 carry forward surplus or deficit and any excess federal earnings as part of their revenue projections.

In their projected budget for FY 2018-2019, BBCBC used all FY 2018-2019 allocations from the department and the estimated amount of carry forward surplus and prior year excess federal earnings. The total projected revenues by BBCBC was \$37,332,615. The total of these revenues used for the projection were verified.

Projected Expenditures

The total projected FY 2018-2019 expenditures by BBCBC was \$37,909,839. This total is \$411,563 greater than the FY 2017-2018 actual expenditures reported of \$37,498,273. No Case Management Organization (CMO) deficits were identified in the risk pool application request or the budget projections provided.

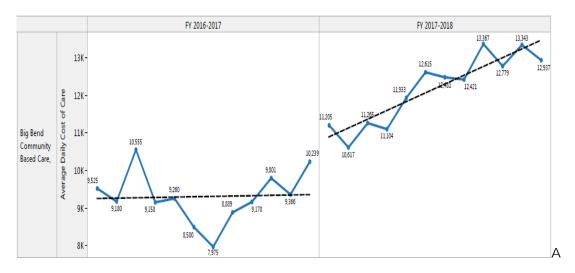
The Case Management line of their budget was \$411,146 greater than their actuals from last fiscal year. While other line items were more or less than last year, the overall increase in budget was essentially due to this one line. The increase to this line was identified as the annualized amount from the creation of a CASE Aim unit in Circuit 14 (Panama City) with Children's Home Society (CHS) at \$341,028 of the increase, and \$85,232 annualization of the addition of a Program Manager also in Circuit 14 with CHS. These two additions were implemented in May 2018. A reduction to another CMO contract of \$16,000 based upon a FY 2017-2018 surplus was also included in the projection.

Other changes to the budget reflect BBCBC's decision to bring foster home management in-house in Circuit 2 only to help improve foster home recruitment and retention efforts. This moved budget from the Foster Home Management line to their BBCBC Operations line.

The projection used for their FSFN Board line of \$6.7 million, which includes payments for clients in licensed care (both foster home and group care), is about \$20,000 less than the amount of their actual expenditures for FY 2017-2018. However, since the trend in their average daily (facility-based) group care has been on an increasing trend since January 2017 (\$7,975 per day) to June 2018 (\$12,937 per day), the only way that this projection could occur is if the average daily costs for group care declines at essentially the same rate with which it increased during FY 2017-2018. The average daily rate for July 2018 was \$11,205 per day, so the daily average rate must decrease by \$1,732 per day (or 13.4 percent) over the course of the fiscal year. Given the recent data and this assumption of decrease, the possibility exists that the

projected deficit could be understated if BBCBC is unsuccessful with their plans for this fiscal year.

For example, during interviews with BBCBC staff they stated that they believed there was an opportunity to safely move children currently in residential group care to family foster homes – If more family foster homes were available – or to relative placements. One of their actions in the Financial Viability Plan for FY 2018-2019 is related to this issue.



FY 2018-2019 Financial Viability Plan

In the design and instructions for the Financial Viability Plan (FVP) templates, the department requested that CBCs identify their actions to address three primary cost drivers:

- 1. Factors related to entries into care
- 2. Factors related to the cost of children while in care
- 3. Factors related to exits from care

BBCBC's FVP does contain actions to address the three primary cost drivers affecting their financial position. The actions include:

- o Increasing the effectiveness of foster home recruit and support in both circuits.
- Holding monthly staffings and reviews of high cost placements for children in residential group care.
- Formal case reviews to identify children who could be safely moved from group care.
- o Achieving the adoption goal of 178 finalized adoptions.
- o Contracting of Parent Behavioral Health Assessments (PBHAs) for all parents involved in cases were CPIs have identified present or impending danger.

The actions in the FVPs contain few specific measurable performance numbers outside of the goal for adoptions and formal case reviews resulting in relative

placements of 80% by the fourth quarter of FY 2018-2019. Specifically, the plan does not identify how the actions will affect entries, exits, the number of children in licensed foster homes, or the number of children in residential group care.

Projected Deficit

The Risk Pool application requested \$577,224 which is the amount projected by BBCBC. The projected deficit is 1.5% greater than their projected revenues.

A Children's Services Council does not currently exist in Circuits 2 or 14, however the CBC reports that discussions have initiated to address the feasibility of adding this resource to the system of care in Leon County (Circuit 2).

No findings were identified in the most recent CPA audit of June 30, 2017.

6. Findings related to overall management.

- Sources: (CBC Contract Monitoring Report, Financial Viability Plan)
 - 6.1. To what extent is there clear and effective communication between and among the Region, the CBC, the Sheriff (if applicable), case management organizations and other key community partners?
 - 6.2. How actively and effectively does CBC management track programmatic performance and fiscal performance?
 - 6.3. What actions have been taken by the Region and/or the CBC to resolve the fiscal issues without accessing the Risk Pool? What further actions are planned?

Overall, the Region and CBC have a positive working relationship and are typically able to resolve issues.

BBCBC is a Governor's Sterling Award winner (2016) and prides itself on utilizing data to drive performance. Frontline interviews indicate a need to trickle down data analytics to augment frontline operations. In early 2018, BBCBC created a dedicated Data Unit with the expressed goal of creating cost savings through the use, synthesis, and distribution of data.

BBCBC has made several enhancements to the system of care intended to enhance fiscal sustainability and drive performance. Examples of enhancements BBCBC has made include:

- Enhancements to safety support services in both Circuits 2 and 14 to include a new contract with Life Management Center as of May 1, 2018
- Formal case reviews -
 - Children placed in group care to determine the feasibility of moving to a less restrictive placement setting
 - o Children in care six or more months (SCRUBBS initiative)
 - Children placed in high cost placement settings to identify trends and solutions to reduce the cost of these placements through alternative placement and services
- Integration of the CLEAR search system with the Diligent Search Unit to improve the identification of prospective relative caregivers

- Foster home management transitioned from Children's Home Society to BBCBC in Circuit 2 as of April 2018
- Manpower efficiencies resulting in salary cost savings
 - o Combination of placement, eligibility, and voucher units
 - o Behavioral Health Coordinator position (a combination of two former positions - Network Provider Specialist and Utilization Management Specialist)

Summary of Findings:

Based on the information reviewed the Risk Pool Review Committee was able to affirm the following:

- The team affirms that BBCBC's service area has experienced an increase in children entering out of-home-care
- BBCBC has seen in increase in the use of residential group care
- There has been a decline in permanency within 12 months
- Do to the rural nature of most of the service area diversion services are not widely available.

Recommendations:

The Peer Review Committee found that BBCBC qualifies for risk pool funding with a full distribution of \$577,224.

- 1. BBCBC should continue initiatives itemized above, in Section 6.
- 2. BBCBC should reduce their reliance on group care with an emphasis on reducing the number of children over the age of 5 in residential group care.
- 3. BBCBC should continue to enhance foster home management which should yield a net increase in the number and quality of licensed foster homes. Coupled with the combination of the diligent search and CLEAR search teams, identification and increased use of less restrictive placement options should result in a reduction in group care costs.
- 4. BBCBC should continue monthly, or more frequent, formal case reviews of all children placed in group care to identify children who could be moved to a less restrictive placement. Reviews should include placement and licensing staff to ensure newly licensed homes, with or without enhanced supports, are explored as safe placement options.
- 5. BBCBC should collaborate with the department to increase utilization of diversion services as a safe alternative to removals.
- 6. BBCBC must continue to work on their financial viability plan.